

PERSONAL SERVICE REPORT

110 145433

Plant of Corro Copper and Bross Company	Date August 30 1971
Address E. St. Louis Illinois	Plant No
Attention: Mr. A. Suhre, Mr. P. Tandler Mr.	C. Hummel Mr. W. Loren.
Copy to Mr. T. Cornwell, Mr. W. Wisema	
Mr. I.F. Schoch, Nalco	- Anna Allanda (m. 1880) den anna (managana)

Purpose of today's call was to (1) inspect BAF#6
automatic bleed off control setup (Nalcontrol II)
(2) Discuss the new cooling toner, BAF#5 (3)
Review test records (4) Clarify cooling water treatment
program changes.

Inspection of the BAF to system revealed that the Nalcontrol II unit is installed properly. I did find, however, that the solenoid valve was inoperative. This was reported to Mr. Frank Eggers and Mr. C. Hummel. At the present, city mater is being added to the system in excess of what is required for normal operation. This of course is holding the concentration ratio down. Analysis of the cooling water is as follows:

Name of Mace of Mo 158 60 79 320 None Mine 1.3

Makeup 132 136 48 .7.8 240

As shown, no treatment is being added to the system. Also, no samples are being brought to the laboratory. Under present conditions, the water in BAF \$6 tower is corrosive and will be until some action is taken by the sypplier of the system to increase cooling capacity. As discussed, if the rondition is to persist for an extended period of time, a corrosion inhibitor will have to

The extra water is being added due to the fact that the water returning from the tower is 98-100F and should be no more than 90F.

Copy with wirn Won Lorenz Signe Contranton Title Rep District 16

Page No. / of Z pages.



PERSONAL SERVICE REPORT

Plant of Corre Copper and Brass (o. Date August 30, 1971
Address E. St. Louis Illinois Plant No.
Attention: See Dage 1
Copy *o:
be added to system to protect equipment.
Review of last records indicated that the softeness
are not being regenerated as soon as they should
be. They are being allowed to operate at high
Tevels of hurdress for as mich as 24 hours.
A recurrence of scaled boilers will be forthcoming
unless this can be curbed. We recommend having
the people responsible for regeneration test the
softeness at least force per shift with a
versenate hardness kit. This would simply entail
providing a small bottle with a 100 ml mark on it (from lab) and Add reagents H-2 and H-3 as in lab a Add (by the drop) the H-1 titrating
on it (from /ab) (3) Add reagents H-2 and H-3
is in lab @ Add (by the drop) the H-1 titration
at the south of the south
solution with a bulb pipette. The appropriate
multiplying factor can be determined by the lab. When the softeners exceed 5 ppm,
lab. When the softeners exceed 5 ppm,
the operator com regenerate.
The change-over from 345-360 treatment
245 - 344 / Car Car Car
Million of the things and
A lefter classifying this will be forwarded
the change-over from 345-360 treatment program to 345-344 has been confusing. A letter clarifying this will be forwarded under separate cover.
C. Hummal 10 G 1 Sint
Cooy left with Works Lorang Signed Don Eyanlantitle Reg District 16

Page No. 2 of Z pages.



126/ 15/ 197: -Some Cooper and Diass Conjoury in de dely 15 197.

Anode Cooling Tower & Treatment lovels low tody but test records Indicate that levels are normally in the specified impair

OCNOSTOWER. Transment lovels slightly high

sasion could be Wote low lone ratio - operation presenting Blug 14 Tower: Note 10w one 50 :2010 reduceu.

5 75 X Mill Area Cooling Wilter System. No tests run by myself today.
However, Fests node of instander of Man Mill Compressor 3754
moods blood off End as week inchange. No. 1 - Scoling
conditions oxist despite treatment levels.

20%	3.06 20/2				20/02		1300					B11 (00)11B
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4	3.2 12				0/		1,9					Anode Cooling Two
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PRESENT COCAGES

30/35

SA Bullers

10-15/4/000 5-10/6/04

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Add 365 and 360 on a 1 to 1 busis by weight 345 weight 2/010s / gallon, 360 Sull weights maintain levels motod . . Les Planlone loguired to A. Suhre M. Mustafe Add as

C03418

Party Co. 1 Lades

NALCO CHEMICAL COMPANY



PERSONAL SERVICE REPORT

Flancos Cerro	Coppor an	nd Brass	Date Ju	19 15, 1971
Adaress E. St.	Louis, Ill	10013	Plant No	····
Amention 500	Doga No	10+2-		
Copy 19:				

The following observations were made on today's call in addition to those noted on page 1 of 1.

Sefteners # I and # a in foundry threw:

Neither of These units have been producing as good of results as they are capable. Suspect this is due to regeneration procedure since the new multiport values were installed I will plan on working with your man in near future to conduct clution studies on both units. This will determine optimum procedure which can be printed and posted on each unit.

B.A.F. No. 6 (in Bldg 80) Cooling System:
This system should be treated and samples brought to laboratory for regular analysis.
Suggest installing Nationfrot II unit as soon as possible. I control limits same on this system as on other cooling systems I.

B.A.F. No. 5 Tower (In work):

Suggest obtaining a Nalcontrol II unit like the one mentioned above for this system for good control from the start.

Page 10. 2 1 2 pages.

Sicro Don The law Dilker Fistrice 16

SCALE REMOVER

PRINCIPAL USES

NALCLEAN 468 is a dry acid product specially formulated for removing water hardness deposits from industrial equipment. It is particularly effective in dissolving calcium carbonate scale formed in water lines, boilers, evaporators, air conditioning systems and process equipment. Its dry form and built-in dye indicator make it convenient for use in routine maintenance cleaning. NALCLEAN 468 contains an effective inhibitor which minimizes corrosion in the acid cleaning application.

GENERAL DESCRIPTION

NALCLEAN 468 is a pulverized product containing a blend of dry acids. It is inhibited to protect the metals commonly encountered in industrial equipment. The dye indicator produces a color change (blue-green to purple) in NALCLEAN 468 solutions as the acid strength is depleted.

Color	Violet
Odor	Sweet
Density	75.8 lb./ft. ³
pH of 3 % solution	0.9
Solubility (100° F)	24% by wt. max.

SHIPPING

NALCLEAN 468 is shipped in plastic-lined, disposable fibre drums of approximately 350 lbs. net weight.

HANDLING

NALCLEAN 468 and its solutions are more convenient to handle than strong liquid acids. When using any acid-type materials, however, reasonable precautions should be taken. Contact with the eyes and prolonged or repeated contact with the skin should be avoided. Avoid breathing dust. Do not take internally.

STORAGE

Store in dry area. Provide suitable venting when cleaning closed systems. Keep open flames away from the vent during and immediately following cleaning.

FEEDING

Dissolve in water. Pour or pump into equipment to be cleaned and circulate. The product may be added directly to a water system where good solution and mixing of the chemical are assured.

SERVICE

Based on a survey of the particular unit and system involved, your Nalco Representative will make recommendations on application techniques to assure thorough cleaning. Additional recommendations will be made on a regular treatment program designed to prevent new deposit formation or corrosion. Your Nalco Program can include showing operators how to run tests and control treatment — the performance of confirming tests by your Nalco Representative — and the review of test records so that recommendations can be modified to meet changed conditions.

DOSAGE

15-40 lbs./per 100 gallons water (approximately 2-5% solution by weight) based on the water holding capacity of the equipment.

Note: Two pounds of NALCLEAN 468 will dissolve up to one pound of most calcium or magnesium salts.

When the scale is heavy or very adherent, higher solution strengths or several cleanings may be necessary for complete scale removal.

NALCO CHEMICAL
6216 W. 66th Ploce Chicago 38, Illinois

C03423

IN CANADA: Alchem Limited, Burlington, Ontario e IN ENGLAND: Nalco Limited e IN ITALY: Nalco Italiana, S.p.A. e IN SPAIN: Nalco Espanela, S.A. IN MEXICO: Nalco de Mexico, S.A. de C.V. e IN VENEZUELA: Nalco de Venezuela, C.A. e IN WEST GERMANY: Deutsche Nalco-Chemie G.m.b.H.

Hr Juvas	CERRO COPPER PRODUCT Olvision of CERRO CORPORATION P. O. BOX 681 EAST ST. LOUIS, ELLINOIS 6220	ı
SUBJECT YOUR ME	0=4/9/74 - PIPING From #5 NOILDATE 5/8	174
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	Price Out The Proposes Scopi O.	•
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WORK POR	NO TO MONTON SONVICT INTO NO.1 X	714
REPLY	SIGNED	
cc C. H	7m cz	
	SIGNED DATE	

Poly Pak (50 sets) 4P472

DETACH AND FILE FOR FOLLOW-UP

C03429

OTHER ADDRESSEES . FOR INFORMATION

CERRO COPPER PRODUCTS

DIVISION OF CERRO CORPORATION

INTERNAL MEMORANDUM

CC: C. Hummel File

1104

Form HQ-10

SHOW NAME, TITLE AND UNIT OF ADDRESSEE AND ADDRESSOR

^{10:} Paul Tandler

BATE: April 9, 1974

FROM: A.W. Suhre

SUBJECT: Piping from No. 5 Deep Well

The entire piping system is in poor condition and should be replaced or eliminated.

At present the water from No. 5 well, which is tied in with No. 6 well, is used at No. 2 B.A.F., Piercing Mill furnace heat exchanger, Piercing Mill side rolls, outlet rolls, bosh tank, No. 20 drawbench heat exchanger, building 80 compressors heat exchanger, and the incinerator. The No. 5 well also supplements No. 6 well, which supplies water to the Anode bosh tanks and pollution control systems.

Future plans for No. 2 B.A.F. will not require well water; therefore, the 6" line into the Mill can be eliminated.

We will require well water at the Incinerator, Piercing Mill side rolls, outlet rolls, and bosh tank. Unless there is some reason other than cost not to proceed, I would propose to replace the present piping from No. 5 well to the point where it enters the floor at the northwest end of Bldg. 80, with the necessary feeders for fire drops, Incinerator and Piercing Mill rolls, and Bosh tank. Attached are details of present and proposed systems.

A W Subre

AS/mr Attchs/

PRESENT WELL WATER SYSTEM IN BLDG. 80

From Pump - 8'' line valved to send water into Bldg. 80 and into Tube M_111 . Bleed lines on 3 valves to sewer; one fire hose connection.

8" line into Bldg. 80 rises above trusses at point between columns K/22 and K/23 running west past column K/3 where 6" line enters floor, then under road to Anode Building.

At Column K/21----2" take off to compressor room

At Column K/18-----6" line southerly to D/18

At Column H/18----3" drop to P.M. Furnace

At Column H/18-----4" line westerly to H/15

At Column H/17----3" drop to P.M. Runout and Bosh Tanks from 4" line above.

At Column K/17----8" line reduces to 6"

West of Col. K/12---2" drop into Fdy. Locker Room--Capped.

West of Col. K/10--- 6"Valve in main has bleeders to sewer

Between Columns

K/8 and K/7------Main line drops from above truss brace to below brace.

At Column K/4----6" Cu. Line southerly to D/4

At Column H/4-----1½" Cu. Line westerly to H/2 drops to eye level for fire drop (not functional) with 3/4" bleed line from Column H/2 to H/6 to floor drain.

PROPOSED WELL WATER SYSTEM IN BLDG. 80

From Pump--through check valve and shut off valve into building with necessary bleeders (with Ognotz valves) fire hose connection and 4" outlet to connect with incinerator line; run 8" iron pipe to point above trusses.

From point between columns K/22 and K/23, run 6" plastic westerly to drop area past Column K/3, then install 6" iron pipe (present 6" pipe bad at floor).

At Column K/17-----Provide 4" plastic line southerly to Column H/17 for P.M. Outlet rolls, Side rolls, and Bosh Tank

At Column K/3-----Provide fire hose connection in 6" drop

All above lines should be insulated, after installation & test, to eliminate dripping due to sweat.

All unused lines should be removed, which are in the present system.

FROM

CERRO COPPER PRODUCTS

DIVISION OF CERRO CORPORATION
P. O. BOX 681
EAST ST. LOUIS, ILLINOIS 62202

INSTRUCTIONS TO SENDER:

1. DETACH YELLOW COPY. 2. SEND WHITE AND PINK COPIES WITH CARBON INTACT.

INSTRUCTIONS TO RECIPIENT:

1. WRITE REPLY IN RIGHT COLUMN. 2. DETACH STUB AT TOP, RETAIN PINK COPY, AND RETURN WHITE COPY TO SENDER.

A MARIAN MARINE MESSAGE 1990 TO A MARIANCE AND A MA	LANGUAGE REPLY OF STATES
RE: CENTO PO# 2089 TO H.H. HALL COUTE.CO	DATE
FOR SEWER REPAIR	
ATTACHED ARE THE DAILY TIME &	
EQUIPMENT SHEETS FOR THIS JOB. ALL MATERIAL CHARGED TO THIS JOB SHOULD	
BE VERIFIED WITH A COPY OF THEIR	
Suppliers Invoice.	
	· · · · · · · · · · · · · · · · · · ·
CC! P. TANDLEL SIGNED DAVE CORNELL	SIGNED C03433

MINIMUE



Well testomment. Layne-Western Company, Inc.

WATER SUPPLY CONTRACTORS

225 GRAND AVENUE

KIRKWOOD, MISSOURI 63122

Phone: 314/955-3924

	Cerro C	opper & Br	ass	Wall no	D	Date T	ested	1/9/13	
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	mping Level					Manuf	acturer _		
	Size		11			Serial i	No		
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	TEST E	efore trea	TMENT						
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									air line and
	AFTER	CLEAN-UP S	нот						-gauge
3	29	844		26	17	65	Inst	alled new	press. gauge
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WELL TEST DATA SHEET

Layne-Western Company,Inc.

WATER SUPPLY CONTRACTORS

225 GRAND AVENUE

KIRKWOOD, MISSOURI 63122

Phone: 314/965-3924

Job	Cerro Co	opper & Br	ass	Well no	5	_ Date T	ested	7/2/73	
Locati	on Sauge	et, Illino				Tested	Bv	Von Ro	hr
			_			Driver		U.S. M	otor
				Purns Head	4.				
						Colum	n and She		
Length	of Airline	85' (New I	nstallati	LON)					
Non-P	umping Level	17'				Manuf	acturer _	Peerle	SS
Orifice	Size	6" x 5"				Serial	No		
Time	Pizometer Reading (in.)	G.P.M.	Air Gauge Beading (feet)	Pumping Level	Drawdown		ressure Feet	Total Pumping Head	Remarks
2/73	13"	450	None	 	51'6"	0 -	Fiet	Vannya vasas	
		CLEAN-UP	- 						
3/73	18.5	i		73'	56'	0			
	AFTER	1,000 GAL	LON TREAT	MENT					
6/73	31"	680	8	77	60	0			Installed
	16.5	503	35	50	33	25			airline put
	10.5	402	40	45	28	30			on new pressure
	AFTER	нти							gauge
<u>/6/73</u>		(692)			ļ	0			Valve open
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CERRO COPPER PRODUCTS

DIVISION OF CERRO CORPORATION

J. A. Staples
J. W. Goldenberg

File 1104

INTERNAL MEMORANDUM

Form = (-10 SHOW NAME, T

SHOW NAME, TITLE AND UNIT OF ADDRESSEE AND ADDRESSOR

10: W. E. Dunnick, Vice President

FROM: P. Tandler, Dir., of Environmental & Safety Systems

SUBJECT: FEDERAL EPA WATER POLLUTION CONTROL PROGRAM

Mr. Higham and you have asked me to comment on the qualifications of the Illinois Water Pollution Control Program vis-a-vis the 1972 Federal Water Pollution Control Act, passed by the Congress in late 1972. Part 124 of this Act deals specifically with the "State Program elements necessary for participation in the National Pollutant Discharge Elimination System (NPDES)."

In evaluating Illinois' present or future compliance with federal regulations it is necessary to divide the discussion into:a) Standards and b) Administrative Program.

a) Standards:

Illinois currently has very tough effluent and water quality (stream) standards, which are approved by the Federal EPA. Mr. Carl Blomgren, head of the Standards Section for the Illinois EPA, is somewhat familiar with the new federal standards under consideration and sees no difficulty in adapting or amending the present Illinois regulations to meet new federal standards when promulgated.

b) Administrative Program, Permits, etc:

Illinois has a permit program in force which, although very thorough and stringent, does not measure up to the 1972 Federal Act. One of the differences is in the agricultural area where, according to Illinois EPA officials, some 128,000 additional permits are required to meet the federal program. Illinois has until January 1974 to promulgate regulations acceptable to the Federal EPA, and I have been informally advised that the attempt will be made to bring Illinois rules within federal guidelines. The alternative would be a double permit system and the attendant duplication of effort, expense, etc.

Cerro presently does not discharge its waste water directly into any stream or body of water which would require permits. Our waste is discharged into the sewers of the VIllage of Sauget, who has the burden of meeting State or Federal regulations. The current efforts of bringing the Village of Sauget into reasonable compliance with State regulations are well known to you and require no further elaboration.

PT:njw

P.S. I plan to keep the copy of Federal Register Volume 37, Number 247, dated 12-22-72, in my files.

CERRO COPPER PRODUCTS CO. ST. LOUIS WORKS TRANSMITTAL SLIP

ELECTROLYTIC	
☐ ENGINEERING	
FOUNDRY	
☐ INDUSTRIAL ENG.	^
LABORATORY & METALLURGY	Jan 1700
LABOR RELATIONS	. 12-40
MAIN OFFICE	
MAINTENANCE	
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SECURITY	
TUBE MILL	
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For Your Approval For Your Information For Your Signature Note and return to me	too Ma Daulo 22-80 N by mi 115 has finit a parkt year of
COMMENTS: Do You har 7 Prom Ova Same Coru Mr. Danea From CO3566	Wo Rose

Other Addressees

P. Tandler(w/o Attachments)

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

File \0

Date: June 30, 1990

To: R. E Conreaux

From: J. M. Grana

Subject: Industrial Wastewater Operator Certification

Per our discussion, I have enclosed information concerning operator certification. J. Burroughs currently is the only Cerro employee certified. As we discussed it is a good idea to have Tom Cornwell also certified.

The enclosure includes an application, test schedule and a study guide to the test. As you can see from the questions they are fairly simple and they give you the formulas for the test. The operator is only certified for the system they operate.

Joe Burroughs or myself will be happy to help Tom study for the test if he wishes.

CERRO COPPER PRODUCTS CO.

J. Davis

. Davis

J. Grana

J. Hintz

M. McNerney
E. Perschbacher

File 1104

INTERNAL MEMORANDUM

HQ-10 SHOW NAME, TITLE AND UNIT OF ADDRESSEE AND ADDRESSOR

TO: R. E. Conreaux

DATE: ___ April 11, 1990

FROM:

Paul Tandler

SUBJECT:

OIL IN WASTEWATER - UPDATE

Good news - the First Quarter billings from the P/Chem Plant charge us for only \$523 of oil collection-and-disposal related costs.

The First Quarter 1989 and 1988 were \$4,882 and \$7,452, respectively.

This is surely the result of excellent attention paid to what goes down the sewers - my compliments.

We are, of course, transporting our waste oils to approved destinations at a cost, this being more expensive than "down the sewer" as a result of the presence of chlorinated solvents in the waste oil. When we eventually overcome this hurdle our costs will be significantly lower - again.

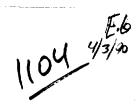
This is another example of making money - by not spending it unnecessarily, thanks to everyone's interest and cooperation.

PT/ge



CERRO COPPER PRODUCTS CO.

P.O. Box 66800 St. Louis, MO 63166-6800 618/337-6000



April 3, 1990

Mr. Joseph K. Crawford P. H. Weis & Associates, Inc. 12231 Manchester Road St. Louis, MO 63161

RE: Village of Sauget, Illinois

Storm Water Study, Project No. 7313-87-1

Dear Mr. Crawford:

Enclosed you will find four drawings showing the property elevations for Cerro Copper Products Co. As I understand it, you have already received stormwater flow information from our engineering consultant, Chester Engineers.

If you should have any questions, please call me at 337-6000.

Very truly yours,

CERRO COPPER PRODUCTS CO.

/Joseph M. Grana Manager of Environmental

and Energy Affairs

JMG/ge

cc: P. Tandler

J. Hintz

Enclosure

October 31, 1989

Mr. George Schillinger General Manager American Bottoms Regional Wastewater Treatment Assoc. #1 American Bottoms Road Sauget, IL 62206

RE: 0il Spill - October 4, 1989

Dear George:

This report is being made as a followup to Cerro's October 4, 1989 phone report of an oil spill to the POTW. The phone report was made at 2:10 p.m. on October 4, 1989 to Mr. Matt Myers of the P/Chem Plant.

At approximately 11:00 a.m. on October 4, 1989 approximately 3,000 gallons of solution oil was inadvertently released to the process sewer system. The spill was the result of a faulty switch on the oil tank makeup pump. The pump's switch was switched to manual to add oil to the system. When the switch was put back into the auto position the contacts stuck in the closed position which resulted in emptying the tank to the mix tank. The mix tank is provided with an overflow to prevent a buildup of oil in the extrusion system.

The faulty switch was found to have rusted because of leaking water over the panel. The water leak has been fixed and the switch greased. Additionally, an alarm light will be installed to tell the operator at his work station that the pump is operating.

Since this was Cerro's PCR sampling day we were able to obtain oil and grease analysis of the discharge from manhole 12C. The results are as follows:

CERRO COPPER PRODUCTS CO.

Mr. George Schillinger General Manager American Bottoms Regional Wastewater Treatment Assoc. October 31, 1989 Page 2

Sample Time	Oil & Grease	Flow (gpm)
10:35 a.m.	520 ppm	81.4
4:48 p.m.	49,600 ppm	57.0
10:37 p.m.	36,400 ppm	42.6
4:30 a.m.	6,580 ppm	107.0

The average daily flow for October 4, 1989 was recorded as 121,680 gallons per day.

If you should have any questions, please feel free to call me.

Very truly yours,

CERRO COPPER PRODUCTS CO.

oseph M. Grana

Manager of Environmental and Energy Affairs

JMG/ge

cc: S. Franzetti

C. Schafer

C. Marcianti

P. Tandler

R. E. Conreaux

J. D. Burroughs

LOWENSTEIN, SANDLER, KOHL, FISHER & BOYLAN

11/30/89

ALAN V. LOWENSTEIN
RICHARD M. SANDLER
BEHEDICT M. KOML
ARNOLD PISHER
JOSEPH EEVOW STEINBERG
HATTHEW P. BOYLAN
BRUCE D. SHOULSON
JOHN R. MACKAY EMO
HARTIM R. GOODMAN
JOHN D. SCHUPPER
STEPHEN N. DERMER
HICHAEL L. RODBURG
ALLEN B. LEVITHAM
R. BARRY STIGER
GREGORY B. REILLY
PETER N. EMRENBERG

HOWARD S. DENBURG STEVEN S. FUERST THEODORE V. WELLS, JR. MICHAEL DORE GERALD KROVATIN RICHARD D. WILKINSON ALAN WOVSANKER KEMBETH J. SLUTSKY DAVID L. HARRIS ZULIMA V. FARBER WILLIAM P. MUNDAY COLLEEN P. KELLY DANIEL J. BARKIN GEORGE J. MAZIN JAMES STEWATY ROBERT L. KRAKOWER

RICHARD P. BOEHMER NORMAN W. SPINDEL OF COUNSEL A PROFESSIONAL CORPORATION

COUNSELLORS AT LAW

65 LIVINGSTON AVENUE ROSELAND, NEW JERSEY

07068-1791

TELEPHONE (201) 992-8700

FACSIMILE (201) 892-5820

SOMERVILLE OFFICE

TELEPHONE (20)1 526-3300

November 30, 1989

LEE HILLES WERTHEIM
STUART S. YUSEM
KEVIN KOVACS
REITH H. ANSBACHER
LAURA R. KUNTZ
ROBERT O. CHESLER
RICHARO F. RICCI
JOHN L. BERGER
LEE ANNE GRAYBEAL
PHYLLIS F. PASTERNAK
RICHARO NIEMIEC
MARY-LYNNE MCIGLIANO
LUCINDA P. LONG
STEPHEN M. SKOLLER
DAVID W. FIELD
MARY JO REICH
ANN F. OSTEROALE
MARTHA L. LESTER
LINDA PICKERING
CAROL A. SURGENS
MICHAEL O'B. BOLDT
BETH ANN WILANSKY
MICHAEL O. B. GOLDT
RICHAEL D. SCOTT
ROCHELLE S. GALIBER
POUN L. KANDEL
PAUL C. PAWLOWSKI

DENNIS F. GLEASON
ANTHONY J. REITANO, JR.
NOWARD A. TEICHMAN
ROBERT G. MINHON
MATTHEW J. BRENNAN
KAREN SAYNOR RILLEEN
DESBIE KRAMMER GREDS
M. ARNE CONLEY-PITCHELL
JEFFREY J. WILD
LEON S. SEBER*
TERRY E. THORNTON
ALEXANDER J. KOVACS
THOMAS G. GRIGGS
CONSTANCE J. ALEXANDER
MARIA A. DANTAS
ARTHUR N. SAIEWITZ
DAVIG S. WOLIN
DOLORES M. SLACKBURN
WALTER A. EFFROSS
GEORGIA A. HEMILLEN
MARC S. KRAMER
GARY M. WINGERS
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CHRISTINE A. RAHIERI
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HIRIAM KAMAN BRODY
GWEN J. LOURIE

"N.Y. BAR ONLY

FEDERAL EXPRESS

Mr. Paul E. Takacs, Project Manager Federal Site Management Unit Remedial Project Management Section Division of Land Pollution Control Illinois Environmental Protection Agency 2200 Churchill Road Springfield, IL 62794-9276

Re: Sauget Sites

Dear Mr. Takacs:

Pursuant to IEPA's request, Cerro Copper is identifying the following as possible additional potential responsible parties at the Sauget Sites Area I. Some of the entities named are companies that conducted manufacturing activities in Sauget. Others named are current or past owners of property included within Area I.

POSSIBLE POTENTIALLY RESPONSIBLE PARTIES

- Big River Zinc
- Harold Waggoner and Waggoner Trucking
- Mobil Oil
- Sterling Steel Foundry
- Sauget and Co./Paul Sauget
- Rogers Cartage Company
- Ethyl Petroleum

2-67

Table 2-1 .

PROPERTY OMMERS/OPERATORS DURING PERIOD OF DISPOSAL OPERATIONS

Site Desig.	Approx. Years of Operation		Present Owner(s)	Source**
G		Leo and Louise Sauget-part (until 1966) Myrtle Hankins Present Cerro property-unknown	Cerro Copper Products Co. Wiese Engineering Co. Emily Hankins, Myrtle Hankins	Property search
¥	1937-1957	Leo and Louise Sauget (1948)	J. D. Tolbird (Roger's Cartage Co.)	Property search
1	1937-1957	Leo and Louise Sauget (1946)	Cerro Copper Products Co.	Property search
J	1955	Sterling Steel Co.	St. Louis Steel Co. (Sterling Steel Foundry)	Property search, personal communication
ĸ	1950-1973	Leo and Louise Sauget (1957)	Bank of Belleville (Trust property for Yvomme Sauget)	Property search
L	1971-1979	Waggoner Trucking Co. (Harold Waggoner)	Tony and Velma Lechner (Metro Construction Equipment Co.)	IEPA file, personal' communication
M.	1950~	M. H. Hell Construction Co.	Thomas Owen	Property search

LOWENSTEIN, SANDLER, KOHL, FISHER & BOYLAN

A PROFESSIONAL CORPORATION

65 LIVINGSTON AVENUE ROSELAND, NEW JERSEY

07068-1791

TELEPHONE (201) 992-6700

FACSIMILE (201) 992-5820

SOMERVILLE OFFICE

TELEPHONE (20) 526-3300

March 28, 1990

LEE HILLES WERTHEIM
STUART S. YUSEM
KEVIN KOVACS
JOHN L. BERBER
LEE ANNE GRAYBEAL
PHYLLIS F. PASTERNAR
RICHARD NIEMBE
MARY-LYMER RICHGLIANO
LUCHBA P. LOHB
STEPHEN H. SKOLLER
DAVID W. FIELD
MARY JO REICH
ANN P. OSTERDALE
HARTHA L. LESTER
LINDA PECKEMING
CAROL A. SURGENS
HICHAEL O'S. BOLDT
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VIVIAN O. LASER
SUMIL E. ROSUSS
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SAMUEL B. SANTO, JR.
JORATHAN T. R. CONEN
CRASS N. LESSINGR
SUSAN L. YOUDOVIN
PAUL F. CARVELLI
JAY A. SOLED
SUSAN L. WALLBROCCK**
ADAN L. GANS

L. YOUDOVIN

*N.Y. BAR ONLY **TEXAS BAR ONLY

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RICHARD P. SOEHMER NORMAN W. SPINDEL OF COUNSEL

WILLIAM S. KATCHEN MICHAEL DORE GERALD KROVATIN

DAVID L. HARRIS

ZULIMA V. FARBER WILLIAM P. MUNDA COLLEEN P. KELLY DANIEL J. BARKIN

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RICHARD D. WILKINSON ALAN WOVSANIKER KENNETH J. SLUTSKY

ALAN V. LOWERSTEIN RICHARD M. SANULER BENEDICT M. KOHL

JOHN R. MACKAY 2HD MARTIN R. GOODMAN JOHN D. SCHUPPER STEPHEN N. DERMER

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PETER H. EHRENBERG HOWARD S. DENBURG STEVEN B. FUERST THEODORE V. WELLS, JR.

Arnold Fisher Joseph Levow Steinberg Matthew P. Boylan Bruce D. Shoulson

> Mr. Paul Takacs, Project Manager Federal Site Management Unit Remedial Project Management Section Division of Land Pollution Control Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62794-9276

> > Re: Sauget Sites Possible Potential Responsible Parties for Area 1

Dear Mr. Takacs:

At our meeting on March 22 Cerro Copper Products Co. agreed to provide IEPA with additional information concerning the basis on which it identified possible potentially responsible parties for Area 1 in its November 30, 1989 correspondence. This letter sets forth the basis for Cerro Copper Products Co.'s belief that certain parties should be added to the PRP list for Area 1.

Those Suspected of Discharging Wastewaters that Entered Dead Creek

As we advised you at the March 22 meeting, because of the original flow direction of Dead Creek from north to south and Dead Creek's subsequent function as a surcharge basin for combined industrial and sanitary wastewaters from the Village sewer system located to the north of Cerro Copper Products Co.'s property, any dischargers to Dead Creek north of Cerro Copper Products Co.'s or to the Village sewer system at or upstream from its surcharge point into Dead Creek Segment A could be a PRP at Area 1. It is on this basis that Cerro Copper

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Mr. Paul Takacs Page 3

We note also that Table 2-1 of the E&E report indicates E&E's determination of ownership at the time of disposal and presently of some of the sites at Area 1. A copy of Table 2-1 is attached for your convenience. We note that Table 2-1 indicates "J.D. Tolbird (Rogers Cartage Co.)" as the current owner of Site H.

To assist you further with regard to ownership issues in Area 1, I enclose a blueprint entitled Village of Sauget Sewer System Layout Drawing No. 1012-L-10 that sets forth lot numbers in the Area 1 vicinity and a March 30, 1962 subdivision map of the area.

Please advise us if there is any further information we can provide concerning ownership of Area 1 properties to assist IEPA.

Very truly yours,

Tames Stewart

JS:her Enclosures

cc: Henry Schweich

Paul Tandler Robert Webb, Esq.

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